

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT
ATLANTA DIVISION

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	INDICTMENT 1:10-CR-310-WSD
	:	
ANDREW S. MACKEY,	:	
	:	
Defendant.	:	

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

The defendant proposes the submission of each of the following questions (and reasonable follow-up) to the venire in addition to those proposed by the government:

1. Do any of you know someone who has been falsely accused of a crime?
2. Do any of you *not* believe it is possible for someone to be arrested and charged with a crime they didn't commit?
3. Do any of you know someone who works in the area of victim's rights or victim's assistance or have you ever worked or volunteered in these areas?
4. Have you or any close relative ever been a victim (or attempted victim) of a scam?
5. Have you or any close relative ever lost money in investments, including the stock market and real estate? If yes, please give details.

6. Have you or any close relative ever been offered an investment opportunity you believed might be a scam or fraudulent? If yes, please give details including why you believed it was a scam or fraudulent.

7. Have you or any close relative ever been a victim of a Ponzi scheme?

8. Have any of you ever met someone you believed to be a con man? If yes, why did you believe that?

9. Have you or a close relative ever applied for a job with or have been employed by a law enforcement agency?

10. Do any of you currently have a family member or close friend in jail or in prison?

11. Do any of you have a negative opinion of attorneys who defend people charged with crimes?

12. Do any of you have a bias against or dislike of attorneys who defend people accused of crimes?

13. Would any of you tend to believe or disbelieve the sworn testimony of a witness solely because that witness is a law enforcement officer or federal agent?

14. Do any of you disagree with the statement that you trust someone until given reason not to?

15. Do any of you believe that it is easy to tell if someone is lying?

16. Do any of you believe that because the defendant has been charged with a crime, he must have done something wrong?

Respectfully submitted,

/s/ Steven H. Sadow

STEVEN H. SADOW

Georgia Bar No. 622075

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CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2011, I electronically filed the foregoing paper with the Clerk of Court using the ECF system which will send notification of such filing to all parties of record.

/s/ Steven H. Sadow

STEVEN H. SADOW